

EXHIBIT D

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**JAMES ZIMMERMAN, MARV
PINZON, and WILLIAM G. VAZQUEZ,
Plaintiffs,**

v.

**ROBERT R. ROCHE, ASHFORD S.
MCALLISTER, FRANK A. FERRARO,
E. SCOTT PRETORIUS, QUANTUM
MEDICAL RADIOLOGY, P.C., U.S.
TELERADIOLOGY, L.L.C., U.S.
MAMMO, L.L.C., NEUROSTAR
SOLUTIONS, INC., NIGHTHAWK
PHYSICIAN INVESTORS, LLC, and
JOHN DOES 1 through 10,**

Defendants.

**Civil Action No.
09-CV-0605-AT**

**QUANTUM MEDICAL RADIOLOGY,
P.C.,**

Counterclaim-Plaintiff,

v.

**JAMES ZIMMERMAN, MARV
PINZON, WILLIAM G. VAZQUEZ,
JOSEPH CHRISTOPHER RUDÉ, III,
and GEORGIA IMAGING
ASSOCIATES, INC.,**

Counterclaim-Defendants.

AFFIDAVIT OF PAUL G. WILLIAMS

Personally appeared before the undersigned officer, duly authorized by law to administer oaths, PAUL G. WILLIAMS, who, upon being duly sworn, testified as follows:

1.

I am of legal age and majority, under no disabilities, and am competent to testify as to the facts contained herein.

2.

I submit this affidavit in the above-styled action in support of Plaintiffs' and Counterclaim-Defendants' Reply Brief in Support of Motion to Extend the Discovery Period.

3.

The facts contained in the affidavit are within my personal knowledge and known or believed by me to be true and correct.

4.

I am an attorney with Kasowitz, Benson, Torres & Friedman, LLC in Atlanta, Georgia. My firm has been retained to represent Plaintiffs and Counterclaim-Defendants in this action. I am one of the attorneys responsible for handling this case.

5.

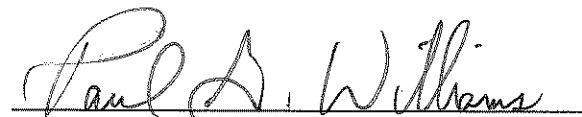
Plaintiffs' counsel contacted Defendants' counsel seeking further financial documents from Defendants in meet-and-confer correspondence dated August 24, 2011 and September 14, 2011. Defendants' counsel responded via e-mail on September 14, 2011 asserting they believed they already had produced all responsive documents.

6.

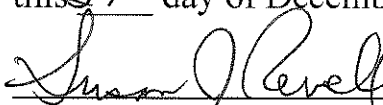
During a telephone call on September 23, 2011, Defendants' counsel, Edward Marshall, informed Plaintiffs' counsel, Kelly Johnson and me, that Defendants had located an additional box of documents that had been stored off-site. This box contained banking records that were among the categories of financial documents Plaintiffs were seeking in their meet-and-confer correspondence.

Further Affiant Sayeth Naught.

This 27th day of December, 2011.


PAUL G. WILLIAMS

Sworn to and subscribed before me
this 27th day of December, 2011.


Notary Public
My commission expires:

